

EXHIBIT 59

ORIGINAL

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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MARK I. SOKOLOW, et al.,

PLAINTIFFS,

-against- Case No:
04CV397 (GBD) (RLE)

THE PALESTINE LIBERATION
ORGANIZATION, et al.,

DEFENDANTS.

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DATE: October 15, 2012
TIME: 2:38 P.M.

DEPOSITION of YITZHAK GOLDBERG,
taken by the Defendants, pursuant to Notice
and to the Federal Rules of Civil
Procedure, held at the offices of Morrison
& Foerster, 1290 Avenue of the Americas,
New York, New York 10104, before Robert X.
Shaw, CSR, a Notary Public of the State of
New York.

1 Yitzhak Goldberg

2 that.

3 Q. Okay. But you do know that
4 there is this lawsuit against the
5 Palestinian Authority and the PLO; right?

6 A. Yes.

7 Q. Do you know why you sued the PA
8 and the PLO?

9 A. Because they helped out the
10 terrorists.

11 Q. Do you have any personal
12 knowledge of that?

13 A. He was a Palestinian cop, like
14 in the -- (Speaking in Hebrew)

15 THE INTERPRETER: He was a
16 policeman in the Palestinian
17 Authority.

18 Q. Okay. How do you know that?

19 A. From the news, from them taking
20 responsibility afterwards, I think.

21 Q. Who took responsibility after?

22 A. I don't know. From the news,
23 that is what they were saying, that it was
24 a Palestinian cop.

25 Q. Okay. Do you know the identity

1 Yitzhak Goldberg
2 of the person who carried out the attack?

3 THE WITNESS: What?

4 THE INTERPRETER: (Speaking in
5 Hebrew)

6 A. No.

7 Q. So, are you aware of any
8 evidence that the PA or the PLO had
9 anything to do with it, other than what you
10 have heard on the news?

11 A. Like do I have any evidence?

12 Q. Yes.

13 A. Like trusting my lawyers for
14 that.

15 Q. Okay. So you don't have any
16 knowledge, personal knowledge?

17 MR. SOLOMON: What?

18 Q. You don't have personal
19 knowledge about these allegations against
20 the PA and the PLO?

21 A. I know that he was a
22 Palestinian cop, that's what I know, in
23 their authority.

24 Q. Okay. So, then is it fair to
25 say that all of the knowledge that you have

1 Yitzhak Goldberg
2 is based on information that you got from
3 other people?

4 A. I don't understand what that
5 means.

6 Q. Is it fair to say that all,
7 that none of the knowledge is knowledge
8 that you saw firsthand personally?

9 A. I didn't -- yes.

10 Q. You weren't there with your
11 father in the bus; were you?

12 A. No.

13 Q. Did you see your father after
14 he died?

15 A. No.

16 Q. Do you know if anyone was able
17 to identify him?

18 A. No. I don't know.

19 Q. All right.

20 A. I don't know.

21 Q. Since the attack, have you
22 written anything about your father or the
23 experience of your father having been
24 killed?

25 A. Did I what?